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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JAMES ROOT, an individual;

Plaintiff;

v.

AMERICAN EXPRESS NATIONAL BANK; a  
national banking association; EXPERIAN  
INFORMATION SOLUTIONS, INC., a foreign  
corporation; TRANS UNION LLC, a foreign  
limited-liability company;

Defendants.

Case No.: 2:20-cv-02267-RFB-NJK

**STIPULATION AND ORDER  
EXTENDING TIME FOR PLAINTIFF  
TO FILE A RESPONSE TO  
DEFENDANT'S MOTION TO COMPEL  
ARBITRATION & STAY ACTION**

**[First Request]**

Under LR IA 6-1, Plaintiff, James Root ("Plaintiff"), and Defendant, American Express National Bank ("Amex") have agreed to extend the time for Plaintiff to file a Response to Amex's Motion to Compel Arbitration and Stay Action [ECF No. 24] ("Motion to Compel") through **April 30, 2021**. Amex filed its Motion to Compel on April 9, 2021 and the current response deadline is April 23, 2021.

The parties request this brief one-week extension to permit Plaintiff additional time to research relevant case law and prepare the necessary briefing to adequately respond to Amex's 20-page Motion to Compel. Plaintiff's counsel is in the process of moving and this has caused a temporary disruption and delay in response time.

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1 This is the first request for an extension to respond to Amex's Motion to Compel and this  
2 request is made in good faith and not for the purpose of delay.

3 Dated: April 22, 2021

Dated: April 22, 2021

4 **LAW OFFICE OF**  
5 **KEVIN L. HERNANDEZ**

**STROOCK & STROOCK & LAVAN LLP**


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*Attorneys for Defendant American Express  
National Bank*

**IT IS SO ORDERED:**

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19 **RICHARD E. BOULWARE, II**  
20 **United States District Court**

DATED this 23rd day of April, 2021.

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